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JUN 19 1992

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY  
ORIGINAL  
FILE

In the Matter of	)	ET Docket No. 92-100
Freeman Engineering Associates, Inc.	)	pp-79
Global Enhanced Messaging Venture	)	pp-80
Metriplex, Inc.	)	pp-81
Mobile Communications Corporation of America	)	pp-82
Montauk Telecommunications Company	)	pp-83
Paging Network, Inc.	)	pp-84
Skycell Corporation	)	pp-85

COMMENTS OF DIAL PAGE, L.P.

Gerald S. McGowan  
Marjorie Giller Spivak

Lukas, McGowan, Nace & Gutierrez,  
Chartered  
1819 H Street, NW, 7th Floor  
Washington, DC 20006  
(202) 857-3500

Attorneys for

DIAL PAGE, L.P.

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SUMMARY

By its comments, Dial Page supports, with some exception, the pioneer's preference requests filed in this proceeding and urges the Commission to authorize as many advanced messaging service proposals as technically possible in the 930-931 MHz frequency band.

The Commission has received 13 proposals for advanced messaging services ("AMS"). Dial Page urges the Commission to initiate a rulemaking proceeding to develop rules and policies to evaluate the pending proposals, and govern an advanced messaging service. Moreover, Dial Page urges the Commission to reject certain proposals that request an excessive amount of spectrum that would preclude the bulk of the pending AMS proposals.

Dial Page submits herein that the Commission must limit the spectrum allocations to 25 KHz and 50 KHz channels to maximize the accommodation of as many competitive AMS services as possible. By so limiting the allocation, Dial Page submits that ten out of thirteen AMS proposals which are either enhanced paging systems or data transmission/messaging services, can be accommodated on the 1 MHz spectrum band.

Accordingly, by developing a licensing scheme for the provision of AMS, the public will be provided with a variety of new communications services.

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COMMENTS OF DIAL PAGE, L.P.

Dial Page, L.P., ("Dial page") by its attorneys, submits comments on the above-captioned requests for pioneer's preferences.<sup>1/</sup> This proceeding is related to a proceeding in which Dial Page urges the Commission to initiate a rulemaking to propose rules and policies for the allocation of the reserve spectrum for an Advanced Messaging Service ("AMS"). Specifically, Dial Page seeks a pioneer's preference for a portion of the spectrum for its innovative Acknowledgement Paging Service ("AP"), a service that will enhance conventional paging

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<sup>1/</sup> These requests were filed pursuant to the Commission's Public Notice of April 30, 1992, requiring that any pioneer's preference requests for proposals that the Commission authorize narrowband data or paging services in the 930-931 MHz frequency band, be filed by June 1, 1992. The Commission accepted these requests on Public Notice Report No. DA 92-712 (June 4, 1992) and seeks comments concerning these requests by June 19, 1992.

service by providing the ability to immediately acknowledge receipt of a page. By these comments, Dial Page will demonstrate that in view of the proposals before the Commission, the Commission should divide the spectrum into 25 MHz and 50 MHz channels to accommodate as many AMS proposals as possible, except for those that request an excessive allocation. Moreover, the Commission must impose spectrum safeguards to ensure that the spectrum allocated for each service is actually used for its intended purpose.

I. Introduction.

1. The subject requests are part of a consolidated proceeding in which the Commission has already pending before it six proposals and pioneer's preference requests for use of the 930-931 MHz reserve spectrum for varying data and messaging services.<sup>2/</sup> The Commission listed these six pioneer's preference requests on Public Notice dated April 30, 1992, including those of Dial Page, Echo Group, L.P. ("Echo")<sup>3/</sup>, Mobile

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<sup>2/</sup> On October 11, 1992, Dial Page filed a petition for rulemaking asking the Commission to establish a Common Carrier Acknowledgment Paging ("AP") service in the 930-931 MHz frequency band. Dial Page supplemented its petition on June 1, 1992. In addition to Dial Page's request, four other parties filed petitions for rulemaking requesting that the Commission allocate spectrum in the 930-931 MHz band for various advanced paging services. The Commission listed these proposals on Public Notice and accepted comments concerning the proposals on June 1, 1992, and reply comments on June 16, 1992.

<sup>3/</sup> Echo proposes a two-way mobile data transmission service. See Echo Petition for Rulemaking (July 30, 1991). Echo requests 50 KHz channels allocated to three local and three nationwide carriers for a total of 300 KHz of the reserve spectrum.

Telecommunication Technologies Corp. ("Mtel")<sup>4/</sup>, Pactel Paging, Inc. ("Pactel") for two different services,<sup>5/</sup> and Pagemart, Inc. ("Pagemart")<sup>6/</sup>. The Commission accepted comments on these requests on June 1, 1992, and reply comments on June 16, 1992.

2. On June 4, 1992, the Commission released a public notice of the subject seven new proposals including those of Freeman Engineering Associates ("Freeman"), Global Enhanced Messaging Venture ("GEM"), Metriplex, Inc. ("Metriplex"), Mobile Communications Corporation of America ("MCCA"), Montauk Telecommunications Company ("Montauk"), Paging Network, Inc. ("Pagenet"), and Skycell Corporation ("Skycell").

3. As will be demonstrated herein, Dial Page supports an allocation for AMS. Moreover, Dial Page supports an allocation for as many different AMS proposals as are technically possible. In addition, Dial Page supports the grant of a pioneer's

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4/ Mtel proposes an allocation for a two-way data transmission service. See Mtel Petition for Rulemaking (November 12, 1992). Mtel requests 50 KHz channels be allocated to three nationwide licensees for a total of 150 KHz of the reserve spectrum.

5/ Pactel proposes a one-way data transmission service. See Pactel Petition for Rulemaking (August 2, 1992). Pactel requests either three 25 KHz or 50 KHz channels for a total of 75 KHz or 150 KHz of the spectrum. In addition, Pactel proposes a one-way ground-to-air service for in-flight passengers to receive a page. See Pactel Petition for Rulemaking (October 15, 1992). Pactel requests three 25 KHz channels, for a total of 75 KHz of the reserve spectrum.

6/ Pagemart proposes a two-way data transmission service. See Pagemart Petition for Rulemaking (February 28, 1992). Pagemart requests 250 KHz channels for two nationwide carriers, and two 150 KHz channels for two local carriers, for a total of 800 KHz of the reserve spectrum.

preference for those services authorized.<sup>7/</sup> However, as will be explained below, Dial Page does not support the pioneer's preference requests for the proposals of Pagemart, Pagenet and Freeman that request an allocation for an excessive amount of spectrum, thus precluding all of the other possible services on the 930-931 MHz frequency band. Pagemart's and Pagenet's proposals request either the entire 1 MHz frequency band or the bulk of the band for their proposals only.<sup>8/</sup> Dial Page submits that an allocation of the entire, or even most, of the 1 MHz frequency band is excessive, impractical and unwise. Such an allocation forecloses the provision of numerous other advanced technology paging systems, thereby denying the public the right to choose between advanced technical applications. Moreover, there is no assurance of either the feasibility or the consumer demand of the services proposed by Pagemart, Pagenet or Freeman. Accordingly, the Commission should allocate a portion of the spectrum for as many AMS proposals as possible and allow the marketplace to ultimately decide the need for these various proposals. Furthermore, the Commission should impose spectrum

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<sup>7/</sup> Except as provided herein, Dial Page supports a pioneer's preference to each applicant that meets the eligibility standard for being awarded a preference.

<sup>8/</sup> Freeman requests "a series of channels 150 KHz wide" plus an additional 56 KHz each for a total of 206 KHz per channel. Freeman does not propose a specific number of licensees; however, since it states a series, Dial Page will assume that Freeman intends more than one licensee.

safeguards<sup>9/</sup> to ensure that the spectrum is used for its intended purpose and not warehoused or wasted.<sup>10/</sup>

**II. Description of New AMS Proposals  
and Amount of Spectrum Requested.**

**A. Freeman Proposal.**

4. Freeman requests a pioneer's preference for its proposal for an enhanced paging service that integrates tone-alert, digital readout, voice, alphanumeric and extended text messaging. Freeman requests that "the Commission allocate a series of channels, 150 KHz wide," and "that a 56 KHz reverse channel be allocated" for response to the incoming call by the paging subscriber to fulfill the need to acknowledge the receipt of a page and send a limited response to the calling party.<sup>11/</sup> Freeman apparently requests an allocation for 206 KHz of spectrum per licensee, however, it does not specify the number of licensees its proposal would accommodate.

**B. GEM Proposal.**

5. GEM requests a pioneer's preference for its proposal for an allocation for a two-way data messaging service, for graphical and textual data. The service will be provided through

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<sup>9/</sup> In its June 1, 1992 Supplement, Dial Page proposed that the Commission establish a usage benchmark for each advanced service to ensure that the service meets a public need. In its June 16, 1992 comments, Dial Page supported a construction requirement and channel loading requirement, as well as a high application fee to help deter speculation.

<sup>10/</sup> At a minimum, should the Commission grant a pioneer's preference to an applicant who does not meet the spectrum usage requirement, that spectrum must be quickly returned.

<sup>11/</sup> See Freeman's Request for Pioneer's Preference (June 1, 1992).

new paging receiver devices which will provide a means for a subscriber to respond to an incoming message via the landline network. GEM requests that six 25 KHz channels be allocated for three nationwide carriers and three local carriers. Thus, GEM requests 150 KHz of the 930-931 MHz frequency band.<sup>12/</sup>

C. MCCA Proposal.

6. MCCA requests a pioneer's preference for its proposal to allocate a portion of the spectrum for a Verified Information Paging ("VIP") service. VIP is a data delivery service with a variety of response or acknowledgment options. MCCA requests three 50 KHz channels for three nationwide licensees, or a total of 150 MHz of the reserve spectrum.<sup>13/</sup>

D. Metriplex Proposal.

7. Metriplex requests a pioneer's preference for its proposal to allocate a portion of the reserve spectrum for a one-way data transmission service with answer back paging. Metriplex requests a nationwide allocation for two 25 KHz channels spaced 500 KHz apart. Thus, each licensee requires 50 KHz of the reserve spectrum band.<sup>14/</sup> Metriplex requests the division of the spectrum into forty 25 KHz channels for its proposed service.

8. Dial Page believes that Metriplex's proposal is a warmed over version of AP. Accordingly, Dial Page does not

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<sup>12/</sup> See GEM's Request for Pioneer's Preference (June 1, 1992).

<sup>13/</sup> See MCCA's Request for Pioneer Preference (June 1, 1992).

<sup>14/</sup> See Metriplex's Request for Pioneer's Preference (June 3, 1992).

support a Pioneer's Preference for Metriplex. Metriplex's proposal is simply the mirror image of Dial Page's AP proposal, and moreover, adds nothing more to it. Dial Page proposed its AP service in October of 1991, and is thus the first one to propose the service. As such, Dial Page is the pioneer of AP service. In addition, Dial Page believes that its proposal for an allocation for AP service could well accommodate Metriplex's proposal.

**E. Montauk Proposal.**

9. Montauk requests a pioneer's preference for an allocation for an advertiser-supported service which would deliver via radio a newspaper-like publication to fax machines equipped with special receivers. Montauk requests four 25 KHz channels, two nationwide carriers, and two local carriers. Thus, Montauk requests 100 KHz of the reserve spectrum.<sup>15/</sup>

**F. Pagenet Proposal.**

10. Pagenet requests a pioneer's preference for a service called "VoiceNow," a voice paging service that will allow a user to be alerted by receipt of a voice page. The pager will have the capability to store the voice message and allow a user to listen to the message at his convenience. Pagenet requests ten 25 KHz channels, or 250 KHz blocks, for two nationwide carriers

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<sup>15/</sup> See Montauk's Request for Pioneer's Preference (May 29, 1992).

and two local carriers. Thus, Pagenet requests use of the entire 1 MHz reserve frequency band for its proposal.<sup>16/</sup>

G. Skycell Proposal.

11. Skycell requests a pioneer's preference for a service called "Telepoint Management Radio," which would provide limited services to carriers licensed in the new PCS area. This service would provide special signalling services needed in conjunction with PCS services. Skycell requests an allocation of one 25 KHz or 50 KHz channel nationwide.<sup>17/</sup>

III. Allocation of Spectrum to AMS Proposals.

12. The Commission reserved the 1 MHz spectrum in the 930-931 MHz band for use by "advanced technology paging systems."<sup>18/</sup> In reserving the spectrum, the Commission thought it would encourage the innovation or development of advanced technology paging systems. As demonstrated by the thirteen proposals pending before the Commission, the Commission was correct. There are several proposals that could significantly benefit the public by meeting certain unmet needs. These proposals support an allocation for AMS. However, the frequency band is limited and cannot accommodate all thirteen proposals. Accordingly, the

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<sup>16/</sup> See Pagenet's Request for Pioneer's Preference (June 1, 1992).

<sup>17/</sup> See Skycell's Request for Pioneer's Preference (May 29, 1992).

<sup>18/</sup> See Amendment of Parts 2 and 22 of the Commission's Rules to Allocate Spectrum in the 928-941 MHz Band and to Establish Other Rules, Policies, and Procedures for One-Way Paging Stations in the Domestic Public Land Mobile Radio Service, 89 F.C.C.2d 1337 (1982).

Commission must issue a notice of proposed rulemaking and adopt certain principles to evaluate each proposal to determine which service should be given a portion of the reserve spectrum.<sup>19/</sup> Moreover, Dial Page submits that the decision of whether a pioneer's preference should be granted in this particular proceeding is tied to the question of which of the subject requests meets the requirements for a new allocation in the 930-931 MHz spectrum.<sup>20/</sup>

**A. The Commission should allocate at most 50 KHz channels.**

13. Dial Page submits that out of thirteen proposals, most can be grouped together and accommodated on the 930-931 MHz band. Specifically, most proposals request either a 25 KHz or a 50 KHz assignment, using various licensing schemes. Only three

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<sup>19/</sup> As Dial Page suggested in its June 16, 1992 reply comments, in determining which services are deserving of an allocation, the Commission should evaluate the following factors: (1) which services are the type of "advanced technology paging systems" for which the Commission reserved the 930-931 MHz band; (2) which services are technically feasible; (3) which services are cost effective; (4) which services will meet a consumer demand; and (5) which services are spectrum efficient.

<sup>20/</sup> In awarding a pioneer's preference, the Commission has stated that it will analyze whether the applicant proposes to provide either a service not currently provided or a substantial enhancement to an existing service. See Establishment of Procedures to Provide a Preference to Applicants Proposing a New Service, 6 FCC Rcd 3488 (1991). Dial Page submits that because this is an allocation for new advanced technology paging systems, the Commission's decision to allocate spectrum for a particular service is strong indicia in and of itself for grant of a pioneer's preference. Except as previously noted, Dial Page does not oppose grant of pioneer's preferences for any of the new proposals the Commission ultimately decides to award an allocation to, as long as that applicant meets the eligibility criteria necessary for a pioneer's preference.

proposals request excessive amounts of spectrum that would virtually preclude all other services.<sup>21/</sup> Thus, Dial Page urges the Commission to impose a limitation on the amount of spectrum allocated to each service to accommodate as many new AMS services as technically possible. Such a policy will also allow the public to choose between services.

14. Dial Page believes that while each of the proposals have unique characteristics and request differing licensing schemes, they can be grouped together easily. First, the services requesting 25 KHz are generally services that enhance traditional paging services, by adding new features. Dial Page requests 25 KHz channels for an acknowledgment paging service, Pactel requests 25 KHz channels for its ground-to-air service, GEM requests 25 KHz channels for its data transmission service, Montauk request 25 KHz channels for its facsimile service, Skycell requests 25 MHz channels for its specialized type service and Pactel requests either 25 KHz or 50 KHz channels for its data transmission service.<sup>22/</sup>

15. Second, the services requesting 50 KHz channels each propose some kind of advanced data transmission/messaging services. Specifically, Mtel requests 50 KHz channels for its

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<sup>21/</sup> The Commission should not allocate an excessive amount of spectrum to a new service that may or may not be viable. Rather, it is prudent to allocate a smaller, but technically feasible amount of spectrum to as many services as possible and allow the marketplace to decide the actual feasibility of the proposals.

<sup>22/</sup> Dial Page includes Metriplex's proposal under its own since it requests a mirror image service.

two-way data transmission service, Echo requests 50 KHz channels for its two-way data transmission service, and MCCA requests 50 KHz channels for its data transmission service.

16. Ten out of thirteen proposals request an allocation for either 25 KHz channels or 50 KHz channels for what is essentially an enhancement to conventional paging or a high speed messaging service. While each of the ten proposals listed above each request differing licensing schemes, i.e. local, regional, and nationwide, the Commission could allocate three channels to each.<sup>23/</sup> By so doing, the Commission even has spectrum left over.<sup>24/</sup>

17. Additionally, Dial Page suggests that since approximately seven of the proposals are for high speed data transmission services, the Commission could group the "data transmission services" under one service and make one allocation for that category. Moreover, since several proposals contain an acknowledgement feature in addition to Dial Page, the Commission could group the acknowledgment part of the proposals under "AP" and make a separate allocation for that service. Should the

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<sup>23/</sup> Specifically, the Commission could allocate sixteen channels of 25 KHz for a total of 400 KHz for the enhanced paging services, and nine channels of 50 KHz for a total of 450 KHz for the data transmission messaging services. This takes into account Metriplex's proposal being considered the same as Dial Page's proposal, and Skycell's request for only one channel.

<sup>24/</sup> As Dial Page explained in its June 16, 1992 reply comments, it supports Motorola's idea to keep any remaining spectrum available to be licensed for needed expansion by AMS providers that actually implemented service. See Motorola Comments (June 3, 1992).

Commission decide to make an allocation according to service, each of the subject parties should be awarded a pioneer's preference for the area they propose to operate.

18. While each proposal is unique, there is a continuum on which each proposals fall. Some services have features of other services that may be able to be combined in an allocation. For example, in addition to Dial Page, Echo, Metriplex, Freeman, Pagemart, and Global each propose services that include the acknowledgment paging feature. Perhaps Dial Page, or any other carrier that provides AP, could provide the AP feature of their proposals, thus, reducing the spectrum requirements of each of the proposals that require AP.

19. In either of the allocation scenarios, the Commission can easily provide a licensing scheme to accommodate many proposals.<sup>25/</sup> By allocating a portion of spectrum to many services, the Commission will permit and encourage the proponents of these services to compete in the marketplace.

**B. The Commission should not grant excessive amounts of spectrum for AMS proposals.**

20. Three of the proposals pending before the Commission request excessive amounts of spectrum that preclude the

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<sup>25/</sup> The Commission can decide on a case-by-case basis whether the applicant requesting a pioneer's preference does indeed meet the requisite criteria. Moreover, the Commission has stated that in cases where it is difficult to distinguish among several innovative parties, it may be appropriate to award preferences to each applicant that can meet the eligibility standard for being awarded a preference. See Establishment of Procedure to Provide a Preference to Applicants Proposing an Allocation for New Services, 6 FCC Rcd at 3495.

allocation of any other services in the 930-931 MHz frequency band. Dial Page submits that Pagemart, Pagenet and Freeman request extremely large amounts of spectrum for their proposed services. Specifically, Pagemart requests an allocation of multiple channels, of 25 KHz for two nationwide and two local carriers, a total of 800 KHz. Pagenet requests that its service be authorized for ten 25 KHz channels or 250 KHz each for two nationwide licensees and two local licensees, or the entire 1 MHz frequency band. Freeman requests for its proposal a series of 150 KHz channels plus 56 KHz channels or 206 KHz per licensee.

21. All three requests are for excessive amounts of spectrum. These requests for such large allocations are unwise given the uncertainty of consumer demand for the proposed services.<sup>26/</sup> Such a large allocation of this spectrum would be wasteful if any of the proposals do not turn out to be feasible, either technically or economically, and the Commission will not likely know whether any such services are feasible, or will be successful, for a lengthy period of time.

22. Specifically, Pagenet proposes to utilize the entire 1 MHz frequency band for a voice paging service. Dial Page does not dispute that Pagenet, through EMCI, has determined a demand for old fashioned voice paging services. However, Dial Page

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<sup>26/</sup> Clearly, all three proposals are for highly complex, untested, albeit innovative, systems. The actual feasibility of any of these proposals has obviously not yet been proven, and cannot be proven until the systems are actually constructed and operated.

submits that it is imprudent to allocate the entire 1 MHz spectrum for a technically complex service that has been overtaken by the new digital service offerings.<sup>27/</sup> Even Pagenet's EMCI marketing study raises skepticism. The study clearly indicates that Pagenet will have to reverse a declining market for voice paging. Moreover, the EMCI study shows that only 8 percent of paging users have tone and voice pagers. The EMCI study demonstrated that future users might select this technology over existing digital display services and existing paging subscribers using voice mail services might be interested in such a service. However, the study also demonstrated that there was still a significant portion of existing digital display paging users (which is 80 percent of the market), who indicated an unwillingness to pay the additional cost of the service or obtain new pagers. Clearly, to allocate the entire 1 MHz spectrum for Pagenet's proposal, Pagenet must carry a heavy

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<sup>27/</sup> Dial Page has determined through the provision of its own paging services that subscribers prefer the new more information intensive offerings. Specifically, even in the mid-tier markets where Dial Page operates, and where there is significant tone and voice capacity, Dial Page has found a significant decline in the number of subscribers that want tone and voice service. Accordingly, Dial Page has seen its tone and voice service decline from 65 percent of its subscriber base in 1985 to 10 percent of its subscriber base today. Thus, Dial Page's own experience in the marketplace belies Pagenet's claim that there is a vast market for tone and voice paging that has been untapped because of urban capacity constraints.

burden to demonstrate why the Commission should deny all the other potential usages of the spectrum.<sup>28/</sup>

23. As Dial Page previously submitted in its June 16, 1992 reply comments, Pagemart's proposal might better be dealt with in the PCS proceeding. In addition, Freeman does not demonstrate why it is entitled to such a large amount of spectrum.<sup>29/</sup> Thus, these three proposal are not appropriate for an assignment of spectrum in the 930-931 MHz frequency band. Any assignment to any one of the three precludes too many proposals for a variety of services.

#### IV. Conclusion.

24. The Commission should initiate a rulemaking to propose rules for the allocation of the reserve spectrum for AMS. Specifically, the Commission should divide the spectrum into 25 MHz and 50 MHz channels to accommodate all the proposals except for those that request an excessive allocation. Moreover, the Commission must promulgate spectrum safeguards to ensure that the spectrum allocated for each service is indeed used for its intended purpose. By developing a licensing scheme for the provision of advanced messaging services, the public will be

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<sup>28/</sup> Additionally, it might have been useful for EMCI to determine whether or not the positive responses it received from the survey would have been different if those people were aware that the voice paging service would preclude all other AMS services.

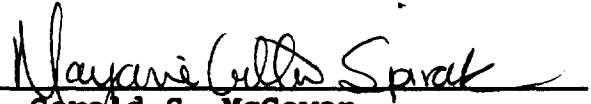
<sup>29/</sup> Dial Page submits that should Freeman be able to implement its proposal using less spectrum, it could likely be accommodated along with the other AMS proposals.

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provided with a variety of innovative services from which to choose.

Respectfully submitted,

DIAL PAGE, L.P.

By:   
Gerald S. McGowan  
Marjorie Giller Spivak

Its Attorneys

Lukas, McGowan, Nace & Gutierrez,  
Chartered  
1819 H Street, NW, 7th Floor  
Washington, D.C. 20006

(202) 857-3500

June 19, 1992

CERTIFICATE OF SERVICE

I, Patricia Edwards, a secretary in the law offices of Lukas, McGowan, Nace & Gutierrez, Chartered, do hereby certify that I have on the 19th day of June, 1992, sent by first class United States mail copies of the foregoing COMMENTS OF DIAL PAGE, L.P. to the following:

Rodney Small \*  
Office of Engineering & Technology  
Federal Communications Commission  
2025 M Street, NW, Room 7332  
Washington, DC 20554

Richard E. Wiley  
R. Michael Senkowski  
David E. Hilliard  
Eric DeSilva  
Wiley, Rein & Fielding  
1776 K Street, NW  
Washington, DC 20006  
Counsel for Mtel

Jeffrey Blumenfeld  
Glenn B. Manishin  
F. Thomas Tuttle  
Blumenfeld & Cohen  
1615 M Street, NW, Ste. 700  
Washington, DC 20036  
Counsel for PageMart, Inc.

L. Andrew Tollin  
Michael Deuel Sullivan  
Wilkinson, Barker, Knauer & Quinn  
1735 New York Avenue, NW  
Washington, DC 20036  
Counsel for Mobile Communications  
Corporation of America

Thomas J. Casey  
Jay L. Birnbaum  
Skadden, Arps, Slate, Meagher & Flom  
1440 New York Avenue, NW  
Washington, DC 20005-2107  
Counsel for Echo Group, Inc.

Michael A. Menius  
Motorola, Inc.  
Motorola Government Relations Office  
1350 I Street, NW, Suite 400  
Washington, DC 20005

Franklin H. Wright \*  
Office of Engineering & Technology  
Federal Communications Commission  
2025 M Street, NW, Room 7332  
Washington, DC 20554

Carl Northrop  
Bryan, Cave, McPheeters & McRoberts  
700 13th Street, NW, Suite 700  
Washington, DC 20005  
Counsel for Pactel Paging

Mark A. Stachiw  
Three Forest Plaza  
12221 Merit Drive, Suite 800  
Dallas, Texas 75251  
Counsel for Pactel Paging

Frederick M. Joyce  
Joyce & Jacobs  
2300 M Street, NW, 8th Floor  
Washington, DC 20037  
Counsel for Celpage, Inc.

Judith St. Ledger-Roty  
Nancy J. Thompson  
Kathleen A. Kirby  
Reed, Smith, Shaw & McClay  
1200 18th Street, NW  
Washington, DC 20036  
Counsel for Paging Network, Inc.

C.E. Baker, Jr., President  
Arch Communications Group, Inc.  
110 Turnpike Road, Suite 210  
Westboro, Massachusetts 01581

Blooston, Mordkofsky, Jackson &  
Dickens  
2120 L Street, NW, Suite 300  
Washington, DC 20036  
Counsel for Freeman Engineering  
Association

Lawrence M. Miller  
Schwartz, Woods & Miller  
1350 Connecticut Avenue, NW  
Suite 300  
The Dupont Building  
Washington, DC 20036  
Counsel for Global Enhanced  
Messaging Venture

Lawrence Movshin  
Thelen, Marrin, Johnson & Bridges  
805 15th Street, NW  
Washington, DC 20005  
Counsel for Metriplex, Inc.

Matt Edwards, President  
1116 Gray Street, Clemens Center  
Elmire, New York 14902  
Montauk Telecommunications Company  
Skycall Corporation

\* Hand Delivered

  
\_\_\_\_\_  
Patricia Edwards